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Attorneys for Plaintiff Daniel Lopez Jr.
and the putative class

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

DANIEL LOPEZ JR., an individual, on
behalf of himself and all others similarly
situated

Plaintiff,

v.

NLP, LLC, and NALS APARTMENT
HOMES, LLC,

Defendants.

Case No. 2:24-cv-06403 CV (SKx)

**NOTICE OF MOTION AND
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

Judge: Hon. Cynthia Valenzuela

Date: April 4, 2025

Time: 1:30 PM

Location: Courtroom 5D

1 **PLEASE TAKE NOTICE** that on **April 4, 2025, at 1:30 PM**, or as soon
2 thereafter as the matter may be heard, at the United States District Court, Central
3 District of California located at 350 W. 1st Street, Los Angeles California, 90012,
4 before the Honorable Cynthia Valenzuela in Courtroom 5D, Plaintiff Daniel Lopez
5 Jr. (“Plaintiff”) will and hereby does move for an order granting preliminary
6 approval of a class action Settlement reached with Defendants NLP, LLC and NALS
7 APARTMENT HOMES, LLC.

8 This notice and motion is made pursuant to Federal Rule of Civil Procedure
9 23(e) and on the grounds that the proposed Settlement is fair, reasonable and
10 adequate and in the best interests of the class. The motion is unopposed by
11 Defendants.

12 This motion is based upon this notice and motion; the Memorandum of Points
13 and Authorities submitted herewith; the Declarations of Ben Travis, Joshua Swigart
14 and Steven Weisbrot and any attached exhibits thereto; the other records and
15 pleadings filed in this action; and upon such other documentary and oral evidence
16 or argument as may be presented to the Court at the hearing of this motion.

17
18 DATED: March 3, 2025

BEN TRAVIS LAW, APC

19
20 /s/ Ben Travis

21 Ben Travis

22 Attorneys for Plaintiff

23
24 DATED: March 3, 2025

SWIGART LAW GROUP, APC

25
26 /s/ Joshua B. Swigart

27 Joshua B. Swigart

28 Attorneys for Plaintiff

Pursuant to Local Civil Rule 5-4.3.4(a)(2)(i), I certify that all other signatories listed, and on whose behalf this filing is submitted, concur in this filing's content and have authorized its filing.

DATED: March 3, 2025

BEN TRAVIS LAW, APC

/s/ Ben Travis

Ben Travis

Attorneys for Plaintiff